

ROGERS CORPORATION

Rogers, Connecticut 06263
(203) 774-9605 TWX 710-448-0047

August 15, 1980

EPA - Region I
Permits Branch
P.O. Box 8748
Boston, MA 02114RCRA RECORDS CENTER
FACILITY Rogers Corp
I.D. NO. CTD0001141167
FILE LOC. R-1A
OTHER _____

Gentlemen:

Attached please find one completed Notification of Hazardous Waste Activity Form for our Rogers facility. We have reviewed the information sent with the form and have determined that the indicated waste activities meet the criteria for listing.

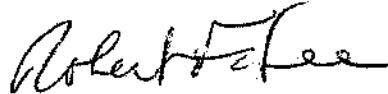
However, due to considerable ambiguity in the supplied tables and differing interpretations of what is reportable (between EPA Regional Offices and States) I believe it is important for us to state our guidelines utilized:

1. Hazardous wastes listed in the various tables are applicable for listing only when disposed material contains "free" or "soluble" chemical. Examples:
 - a. Asbestos Fiber - Free fiber in dust or raw state is reportable. Asbestos bound in resin such as gaskets or molding plastics is not reportable.
 - b. Urethane - Scrap urethane cured foams are not reportable. "Urethane" precursor chemicals - that is unreacted polymers - are reportable.
2. Timing requirements of reporting for August 18, 1980 deadline create a situation whereby it is impossible to "test" wastes for ignitability, corrosivity, reactivity or toxicity within that time frame. Consequently, for wastes not otherwise listed in the supplied tables, we have made "presumptive" judgement that these wastes "may" or "may not" contain ingredients listed in Table I of section 261.24, or are ignitable, corrosive or reactive.

Should any problems arise due to our conception of these requirements, please advise immediately so that these problems can be resolved.

Respectfully,

ROGERS CORPORATION

A handwritten signature in dark ink, appearing to read "Robert F. Lee". The signature is fluid and cursive, with the first name "Robert" and last name "Lee" clearly distinguishable.

Robert F. Lee

Manager of Environmental Engineering

/dcc

Enclosure

Punch additional waste codes

I.D. - FOR OFFICIAL USE ONLY															
S	W	C	T	D	0	0	1	1	4	1	1	6	7	T/A	C
1	2							13	14	15					

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 2 23 - 26	3 F 0 0 3 23 - 26	4 F 0 0 4 23 - 26	5 F 0 0 5 23 - 26	6 F 0 0 6 23 - 26
7 F 0 0 7 23 - 26	8 F 0 0 9 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 0 1 2 23 - 26	32 P 0 5 3 23 - 26	33 P 0 5 4 23 - 26	34 P 0 8 0 23 - 26	35 P 0 9 0 23 - 26	36 P 1 0 0 23 - 26
37 P 1 0 5 23 - 26	38 P 0 0 5 23 - 26	39 P 0 1 4 23 - 26	40 P 0 1 9 23 - 26	41 P 0 6 5 23 - 26	42 P 0 3 0 23 - 26
43 P 1 0 6 23 - 26	44 U 0 0 2 23 - 26	45 U 0 0 7 23 - 26	46 U 0 0 8 23 - 26	47 U 0 0 9 23 - 26	48 U 0 1 2 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)


☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) R.C. Berry - Vice President - R&D H. Tate - Division Manager	DATE SIGNED
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EPA Form 8700-12 (6-80) REVERSE

R.F. Lee - Manager of Environmental Engineering

This location encompasses three distinct Corporate functions: Corporate Administration, Fiberloys Division (A Paper Mill) and Corporate Research and Development. All of the "P" category and most of the "U" category items are associated with R&D; consequently, quantities are very small and generation is highly variable.

I.D. - FOR OFFICIAL USE ONLY															
S	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
W															

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U013	U019	U030	U031	U037	U044
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
U052	U054	U056	U057	U069	U080
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
U088	U102	U107	U112	U113	U117
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED

Please punch additional waste codes



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER										APPROVED										DATE RECEIVED (yr., mo., & day)									
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15										16 17 18 19 20 21 22 23 24 25 26 27 28 29 30										31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55									

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

CITY OR TOWN

ST.

ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

CITY OR TOWN

ST.

ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

☐ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

Please punch additional waste codes

